

FILED - KZ

June 9, 2021 4:19 PM

U.S. DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN

SOUTHERN DIVISION

NEVIN P. COOPER-KEEL, JD  
Plaintiff Pro Se

Case No. 1:21-cv-203

V. Hon.: Janet T. Neff, and/or  
Robert J. Jonker

ALLEGAN COUNTY, et al.,  
Defendants.

Mag. Judge.: Sally J. Berens,

Plaintiff Nevin P. Cooper-Keel, JD  
3127 127<sup>th</sup> Avenue  
Allegan, MI 49010  
616.329.7077  
Nevincooperkeel@gmail.com

Defendant Allegan County  
113 Chestnut Street  
Allegan, MI 49010  
269.673.0300  
bgenetski@allegancaounty.org

Defendant Roberts Kengis  
113 Chestnut Street  
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Defendant Margaret Baker  
113 Chestnut Street  
Allegan, MI 49010  
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Defendant Jennifer Kamps  
113 Chestnut Street  
Allegan, MI 49010  
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Defendant Aimee Kamphuis  
113 Chestnut Street  
Allegan, MI 49010  
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**MOTION FOR DEFAULT JUDGMENT**

Plaintiff states, pursuant to Fed. Rule. Civ. Pro. 55(b)(2):

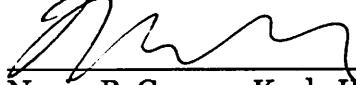
1. Though apparently in Your Honor's order, dated May 17<sup>th</sup>, 2021, some pleadings of Defendant's are referenced, Defendant's have not served any pleadings on Plaintiff (other than a letter denying Plaintiff First Request for Records).

2. That is the same as not having plead them – unless Plaintiff's rights as a litigant don't exist and these judicial proceedings will be resolved through ex parte communications by Defendant's with This Court.
3. The onus for serving Defendant's pleadings lies solely upon Defendant.
4. Upon information and belief, Defendant's have deliberately not served Plaintiff with their pleadings to obfuscate the judicial process and it shows disregard for these judicial proceedings.
5. Because of Defendant not serving their pleadings on Plaintiff, Plaintiff has now had to contend with objecting to a recommended order.
6. Having to object to that Recommendation without knowing what sort of quasi pleadings of Defendant's have been communicated to This Court has prejudiced Plaintiff.
7. And now there are ex parte communications between Defendant's and This Court that Plaintiff has yet been denied knowledge of and any opportunity to respond to.
8. Though that is probably not This Court's fault, it is a recurring underhanded tactic in Defendants's modus operandi.
9. Plaintiff has been further prejudiced by these delays in his divorce case in Allegan County's 48<sup>th</sup> Circuit Court, because with the numerous ex parte communications between Judge Kengis and the other party in that case, Judge Kengis has twice refused to recuse himself from the case and Plaintiff has had to petition The Michigan Court of Appeals to take superintending control of that case because it is a foregone conclusion of being a mistrial.

10. Plaintiff wanted these injustices solved last year when his children were parentally kidnapped – not further delayed by Defendants's unethical litigation tactics of trying to slip in pleadings without serving them on Plaintiff.
11. Since Defendant's have not plead anything responsive to Plaintiff's Summons and Complaint to Plaintiff's knowledge, but for rumors of it that Plaintiff has only heard of through This Court's orders, entry of default judgement is appropriate in this matter.

WHEREFORE, please enter default judgment against Defendants in whatever amount Your Honor thinks is fair (Plaintiff's complaint states the amount he believes is fair).

Respectfully Submitted,



6.8.2021

Nevin P. Cooper-Keel, JD – Plaintiff pro se